

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CHEMIMAGE CORPORATION

Plaintiff,

v.

JOHNSON & JOHNSON and ETHICON, INC.

Defendants.

24-CV-2646 (JMF)

**JOINT STIPULATION AND ~~PROPOSED~~ ORDER  
REGARDING EXHIBITS ADMITTED FOR TRIAL**

Plaintiff ChemImage Corporation (“ChemImage”) and Defendants Johnson & Johnson (“J&J”) and Ethicon, Inc. (“Ethicon” and, together with J&J, “Defendants” and, together with ChemImage, the “Parties”), hereby agree and stipulate as follows:

1. The Parties agree that the exhibits in Table 1 below were cited in the affidavit of Ms. Tamara Lanier. These exhibits were inadvertently left off the Parties’ March 17, 2025 Joint Stipulation and Order Regarding Exhibits Admitted For Trial and Exhibit Exchange Protocol. *See* Dkt. 172.
2. The Parties agree that the exhibits in Table 1 are admissible for purposes of trial:

**TABLE 1**

<b>Trial Exhibit</b>	<b>Description</b>	<b>Used in Witness Affidavit</b>
DX 539	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20211718, dated 3/31/2021	Lanier
DX 540	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20211725, dated 4/30/2021	Lanier

<b>Trial Exhibit</b>	<b>Description</b>	<b>Used in Witness Affidavit</b>
DX 541	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20211730, dated 5/31/2021	Lanier
DX 542	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20211740, dated 6/30/2021	Lanier
DX 543	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20211749, dated 7/30/2021	Lanier
DX 544	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20211755, dated 8/31/2021	Lanier
DX 545	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20211760, dated 9/14/2021	Lanier
DX 546	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20211762, dated 9/30/2021	Lanier
DX 547	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20211767, dated 11/1/2021	Lanier
DX 548	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20211770, dated 11/19/2021	Lanier
DX 549	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20211774, dated 12/1/2021	Lanier
DX 552	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20221806, dated 3/30/2022	Lanier
DX 553	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20221821, dated 7/15/2022	Lanier
DX 554	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20221822, dated 7/30/2022	Lanier
DX 555	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20221828, dated 8/16/2022	Lanier
DX 556	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20221834, dated 8/31/2022	Lanier

<b>Trial Exhibit</b>	<b>Description</b>	<b>Used in Witness Affidavit</b>
DX 557	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20221835, dated 9/15/2022	Lanier
DX 558	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20221839, dated 9/30/2022	Lanier
DX 559	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20221840, dated 10/15/2022	Lanier
DX 560	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20221842, dated 10/31/2022	Lanier
DX 561	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20221844, dated 11/15/2022	Lanier
DX 562	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20221846, dated 11/30/2022	Lanier
DX 563	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20221852, dated 12/15/2022	Lanier
DX 564	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20221853, dated 12/29/2022	Lanier
DX 566	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20231859, dated 1/31/2023	Lanier
DX 567	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20231862, dated 2/15/2023	Lanier
DX 568	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20231865, dated 2/28/2023	Lanier
DX 569	Invoice from ChemImage Corporation to Ethicon Endo-Surgery, Inc. - No. 20231872, dated 3/15/2023	Lanier
DX 572	Purchase Order from ChemImage Corporation to Ethicon Endo-Surgery, Inc.-Cincinnati No. 994337689, dated 9/9/2021	Lanier

<b>Trial Exhibit</b>	<b>Description</b>	<b>Used in Witness Affidavit</b>
DX 573	Purchase Order from ChemImage Corporation to Ethicon Endo-Surgery, Inc.-Cincinnati No. 994418867, dated 11/18/2021	Lanier
DX 575	Purchase Order from ChemImage Corporation to Ethicon Endo-Surgery, Inc.-Cincinnati No. 994467489, dated 3/30/2022	Lanier
DX 576	Purchase Order from ChemImage Corporation to Ethicon Endo-Surgery, Inc.-Cincinnati No. 994499460, dated 6/27/2022	Lanier
DX 577	Purchase Order from ChemImage Corporation to Ethicon Endo-Surgery, Inc.-Cincinnati No. 994533081, dated 9/30/2022	Lanier

3. The Parties agree that the exhibits in Table 2 through Table 13 below are admissible as part of designated deposition testimony, subject to the objections indicated below.

**TABLE 2**

<b>Exhibits included in the Parties' Designations and/or Counter-Designations for Hani Abouhalka</b>			
<b>Trial Exhibit</b>	<b>Plaintiff's Designations</b>	<b>Defendants' objections to testimony</b>	<b>Deposition Exhibit Number</b>
PX-328	31:14-32:16		Exhibit 2
PX-322	49:5-11		Exhibit 3
PX-316	62:3-9		Exhibit 4
PX-327	94:19-20		Exhibit 7
PX-308	98:5-7; 98:11-18		Exhibit 8
PX-476	104:8-11; 105:3-6		Exhibit 9
PX-403	111:9-9		Exhibit 10
PX-403	111:14-15; 11:25-112:8		Exhibit 10
PX-368	117:5-7		Exhibit 11

<b>Trial Exhibit</b>	<b>Defendants' Designations</b>	<b>Plaintiff's objections to testimony</b>	<b>Deposition Exhibit Number</b>
PX-316	69:22 – 70:5	Relevance (402/403)	Exhibit 4

**TABLE 3**

<b>Exhibits included in the Parties' Designations and/or Counter-Designations for David Berkman</b>			
<b>Trial Exhibit</b>	<b>Defendants' Designations</b>	<b>Plaintiff's objections to testimony</b>	<b>Deposition Exhibit Number</b>
DX 196	29:4 - 33:1	Relevance (401/402); 30:14-33:1: Lack of Foundation (901 / 902)	Exhibit 2
DX 135	48:17 - 49:14		Exhibit 7
DX 135	50:19 – 52:2	Relevance (401/402) (subject of MIL (outside scope of termination letter)	Exhibit 7
DX 86	56:15 – 59:20	Relevance (401/402) (subject of MIL (outside scope of termination letter)	Exhibit 8
DX 123	70:8 - 72:15	Relevance (401/402) (subject of MIL (outside scope of termination letter)	Exhibit 10
DX 219	96:7 - 97:1	Relevance (401/402)	Exhibit 17
DX 219	97:20 – 98:12	Relevance (401/402)	Exhibit 17

**TABLE 4**

<b>Exhibits included in the Parties' Designations and/or Counter-Designations for Jeffrey Cohen</b>			
<b>Trial Exhibit</b>	<b>Defendants' Designations</b>	<b>Plaintiff's objections to testimony</b>	<b>Deposition Exhibit Number</b>
PX-776	242:1 - 243:13		Exhibit 2
PX-776	12:20 - 13:21		Exhibit 2
DX 197	64:18 - 65:4	Relevance (401/402); Lack of Foundation (901/902)	Exhibit 3
DX 197	66:4 - 67:4	Relevance (401/402); Lack of Foundation (901/902)	Exhibit 3
DX 195	67:11 - 67:20	Relevance (401/402)	Exhibit 4

DX 221	68:4 - 68:10	Relevance (401/402); subject of MIL (finances)	Exhibit 5
DX 221	68:14 - 69:3	Relevance (401/402); subject of MIL (finances)	Exhibit 5
DX 140	76:8 - 77:8		Exhibit 6
DX 236	91:18 - 93:7	Relevance (401/402); subject of MIL (finances)	Exhibit 10
DX 87	99:5 - 100:2	Relevance (401/402); subject of MIL (finances)	Exhibit 12
DX 124	118:10 - 118:22		Exhibit 14
DX 124	119:22 - 120:11	Relevance (401/402); subject of MIL (finances)	Exhibit 14
DX 124	122:3 - 122:14	Relevance (401/402); subject of MIL (finances)	Exhibit 14
DX 237	134:10 - 136:1	Relevance (401/402); subject of MIL (finances)	Exhibit 16
DX 238	136:6 - 136:21		Exhibit 17
DX 231	144:6 - 147:10	Relevance (401/402); subject of MIL (finances)	Exhibit 18
DX 231	153:7 - 154:17	Relevance (401/402)	Exhibit 18
DX 231	154:22 - 156:8		Exhibit 18
DX 146	162:1 - 164:7	Relevance (401/402); subject of MIL (finances)	Exhibit 19
DX 224	209:1 - 211:22	Relevance (401/402); subject of MIL (finances)	Exhibit 25
DX 77	212:5 - 213:6	Relevance (401/402); subject of MIL (finances)	Exhibit 27
DX 138	214:18 - 215:13	Relevance (401/402); subject of MIL (finances)	Exhibit 28
DX 131	217:19 - 218:15	Relevance (401/402); subject of MIL (finances)	Exhibit 29

TABLE 5

Exhibits included in the Parties' Designations and/or Counter-Designations for Lee Glover			
Trial Exhibit	Plaintiff's Designations	Defendants' objections to testimony	Deposition Exhibit Number
PX-463	13:6-8		Exhibit 1
PX-462	23:16-17		Exhibit 2

PX-462	24:5-9		Exhibit 2
PX-466	28:22-29:18		Exhibit 3
PX-378	35:8-10		Exhibit 4
PX-474	55:6-8		Exhibit 6
PX-474	55:11-56:20		Exhibit 6
PX-277	63:18-64:19		Exhibit 7
PX-465	74:2-75:5		Exhibit 9
PX-472	77:8-14		Exhibit 10
<b>Trial Exhibit</b>	<b>Defendants' Designations</b>	<b>Plaintiff's Objections to Testimony</b>	<b>Deposition Exhibit Number</b>
DX 323	47:3 – 48:14		Exhibit 1
DX 323	102:1 - 102:6		Exhibit 1
DX 323	104:10 - 105:24		Exhibit 1
DX 323	105:25 - 106:22		Exhibit 1
DX 323	113:8 - 113:18		Exhibit 1
PX-462	24:17 – 24:24		Exhibit 2
PX-462	25:6 – 25:17		Exhibit 2
PX-466	31:13 – 31:21		Exhibit 3
PX-378	42:7 – 42:18		Exhibit 4
PX-378	43:11 – 44:15		Exhibit 4
DX 395	52:14 – 53:11	Improper counter/not relevant to designation	Exhibit 5
PX-474	60:20 - 61:16	Improper counter/not relevant to designation	Exhibit 6
PX-277	64:20 – 65:15		Exhibit 7
DX 579	110:19 - 111:14		Exhibit 8
PX-465	76:1 – 76:11		Exhibit 9
PX-464	82:14 - 82:23		Exhibit 11
PX-464	88:23 - 90:7	Relevance (401/402); subject of MIL (outside scope of termination letter)	Exhibit 11
DX 399	91:11 - 92:1		Exhibit 12
DX 399	92:4 - 93:25		Exhibit 12
DX 399	94:3 - 96:23	Relevance (401/402); subject of MIL (outside scope of termination letter)	Exhibit 12
DX 463	114:25 - 117:2	Relevance (401/402); subject of MIL (outside scope of termination letter)	Exhibit 13

**TABLE 6**

<b>Exhibits included in the Parties' Designations and/or Counter-Designations for Heather Gomer</b>			
<b>Trial Exhibit</b>	<b>Defendants' Designations</b>	<b>Plaintiff's objections to testimony</b>	<b>Deposition Exhibit Number</b>
DX 412A	50:12 - 51:10	Relevance (401/402); calls for legal conclusion (403 / 611 / 701); subject of MIL (outside scope of termination letter)	Exhibit 2
DX 299	55:5 - 55:11		Exhibit 3
DX 299	55:20 – 56:10		Exhibit 3
DX 299	56:17 – 60:16	Relevance (401/402); subject of MIL (outside scope of termination letter)	Exhibit 3
DX 209	65:4 - 66:5		Exhibit 4
DX 209	72:21 - 73:21		Exhibit 4
DX 209	75:7 - 75:11		Exhibit 4
DX 209	75:16 - 78:21		Exhibit 4
DX 209	79:2 - 80:8		Exhibit 4
DX 347	93:5 - 93:22		Exhibit 6
DX 40	93:5 - 93:22		Exhibit 7
DX 347	95:18 - 100:11		Exhibit 6
DX 64	106:9 - 109:5		Exhibit 9
DX 64	109:6 - 110:12		Exhibit 9
DX 205	111:22 - 113:21		Exhibit 10
DX 6	118:1 - 119:8		Exhibit 11
DX 6	225:20 – 226:14		Exhibit 11
DX 6	231:8 – 231:13		Exhibit 11
DX 6	231:16 – 232:11		Exhibit 11
DX 6	234:15 – 235:2		Exhibit 11
DX 6	235:5 – 236:10		Exhibit 11
DX 6	237:2 – 238:12	238:9-12: Hearsay (802); lack of personal knowledge (602); calls for speculation (403/611)	Exhibit 11
DX 26	158:5 - 158:22		Exhibit 16
DX 26	161:5 - 162:10		Exhibit 16
DX 26	163:5 - 163:18	Relevance (401/402); subject of MIL (outside scope of termination letter); Hearsay (802)	Exhibit 16



DX 26	163:19 - 164:15	Relevance (401/402); subject of MIL (outside scope of termination letter); Hearsay (802)	Exhibit 16
DX 26	165:4 - 165:9	Relevance (401/402); subject of MIL (outside scope of termination letter)	Exhibit 16
DX 26	166:7 - 166:17	Relevance (401/402); subject of MIL (outside scope of termination letter); Hearsay (802)	Exhibit 16
DX 26	166:20 - 168:1	Relevance (401/402); subject of MIL (outside scope of termination letter); Hearsay (802); Calls for speculation (403 /611); Vague/Ambiguous questioning (403/611)	Exhibit 16
DX 82	185:14 - 187:18	Relevance (401/402); subject of MIL (finances)	Exhibit 18
DX 82	188:18 - 189:20	Relevance (401/402); subject of MIL (outside scope of termination letter)	Exhibit 18
DX 37	193:22 - 194:12		Exhibit 19
DX 27	196:8 - 197:3		Exhibit 20
DX 58	214:16 - 215:10		Exhibit 22
DX 58	217:18 - 218:21	Hearsay (802); lack of personal knowledge (602)	Exhibit 22
DX 119	253:11 - 255:7	Relevance (401/402); subject of MIL (outside scope of termination letter)	Exhibit 24
DX 119	255:10 - 256:2	Relevance (401/402); subject of MIL (outside scope of termination letter)	Exhibit 24
DX 62	259:13 - 260:9		Exhibit 26
DX 62	260:12 – 261:18		Exhibit 26
DX 13	262:11 - 262:17		Exhibit 27
DX 13	262:20 - 263:6		Exhibit 27
DX 13	269:20 – 270:1		Exhibit 27
DX 13	270:4 – 270:5		Exhibit 27
DX 13	271:15 - 272:18	272:15-18: Lack of personal knowledge (602)	Exhibit 27
DX 117	273:16 - 274:2		Exhibit 28
DX 117	274:9 - 276:14		Exhibit 28
DX 202	300:6 - 300:14		Exhibit 30

**TABLE 7**

<b>Exhibits included in the Parties' Designations and/or Counter-Designations for Steen Hansen</b>			
<b>Trial Exhibit</b>	<b>Plaintiff's Designations</b>	<b>Defendants' Objections to Testimony</b>	<b>Deposition Exhibit Number</b>
PX-2	27:24-28:3		Exhibit 1
PX-336	28:7-10		Exhibit 2
PX-45	35:3-36:24		Exhibit 3
PX-292	52:16-25		Exhibit 4
PX-214	72:24-73:4		Exhibit 5
PX-289	85:8-9		Exhibit 6
PX-123	110:18-114:17		Exhibit 8
PX-706	125:16-25		Exhibit 9
<b>Trial Exhibit</b>	<b>Defendants' Designations</b>	<b>Plaintiff's Objections to Testimony</b>	<b>Deposition Exhibit Number</b>
DX 4	38:9 - 38:23		Exhibit 1
PX-336	68:4 - 72:19	Improper counter (802/804); Relevance (401/402);subject of MIL (outside scope of termination letter)	Exhibit 2
DX 35	41:16 - 44:4	Improper counter (802/804)	Exhibit 3
DX 35	44:5 - 45:4		Exhibit 3
DX 35	46:4 - 47:7		Exhibit 3
DX 365	55:3 - 55:7		Exhibit 4
DX 365	60:10 - 60:14	Non-responsive (611)	Exhibit 4
DX 365	60:16 – 60:20	Non-responsive (611)	Exhibit 4
DX 350	169:21 – 171:2	Improper counter (802/804)	Exhibit 6
DX 350	171:4 – 174:14	Improper counter (802/804)	Exhibit 6
DX 350	171:16	Improper counter (802/804)	Exhibit 6
DX 96	89:7 – 89:11	Improper counter (802/804)	Exhibit 7
DX 96	89:13 – 91:3	Improper counter (802/804)	Exhibit 7
DX 116	114:18 – 115:13		Exhibit 8
DX 116	122:18 – 122:24	Vague/Ambiguous question (403/611); Incomplete (106); Non-responsive (611)	Exhibit 8

TABLE 8

Exhibits included in the Parties' Designations and/or Counter-Designations for Tamara Lanier			
<b>Trial Exhibit</b>	<b>Plaintiff's Designations</b>	<b>Defendants' Objections to Testimony</b>	<b>Deposition Exhibit Number</b>
PX-782	41:23-42:2		Exhibit 2
PX-326	68:20-22		Exhibit 3
PX-1	73:8-9		Exhibit 4
PX-214	155:2-3		Exhibit 6
PX-2	157:19-158:9		Exhibit 7
PX-99	168:25-170:12		Exhibit 8
PX-289	177:5-23		Exhibit 9
PX-463	200:24-201:5		Exhibit 10
PX-174	217:6-8		Exhibit 11
PX-118	227:2-3		Exhibit 12
PX-45	266:14-18		Exhibit 13
PX-485	282:21-283:1		Exhibit 15
PX-41	294:17-21		Exhibit 16
PX-312	300:10-11		Exhibit 17
<b>Trial Exhibit</b>	<b>Defendants' Designations</b>	<b>Plaintiff's Objections to Testimony</b>	<b>Deposition Exhibit Number</b>
DX 529	42:9 - 42:16		Exhibit 2
DX 1	83:7 - 83:11	Incomplete (R. 106)	Exhibit 4
PX-336	140:3 – 142:24	Improper counter (802/804)	Exhibit 5
DX 5	159:23 - 162:2		Exhibit 7
DX 97	172:9 - 172:18	Incomplete (R. 106)	Exhibit 8
DX 210	219:12 - 219:20		Exhibit 11
DX 210	222:1 - 223:7	Improper counter (802/804)	Exhibit 11
DX 36	266:10 - 266:11		Exhibit 13

**TABLE 9**

<b>Exhibits included in the Parties' Designations and/or Counter-Designations for Paul Ritchie</b>			
<b>Trial Exhibit</b>	<b>Plaintiff's Designations</b>	<b>Defendants' Objections to Testimony</b>	<b>Deposition Exhibit Number</b>
PX-1	38:1-4		Exhibit 1
PX-396	42:24-25		Exhibit 2
PX-405	50:1-9		Exhibit 3
PX-240	58:2-10		Exhibit 4
PX-294	68:14-69:14		Exhibit 5
PX-784	87:20-88:9		Exhibit 7
PX-410	91:7-8		Exhibit 8
PX-391	107:1-14		Exhibit 10
PX-365	113:21-114:6		Exhibit 11
PX-392	120:2-8		Exhibit 12
PX-395	124:4-11		Exhibit 13
PX-323	133:18-134:1		Exhibit 14
PX-393	144:17-25		Exhibit 16
<b>Trial Exhibit</b>	<b>Defendants' Designations</b>	<b>Plaintiff's Objections to Testimony</b>	<b>Deposition Exhibit Number</b>
PX-405	50:15 – 50:17	Relevance (402/403); Subject of MIL (finances)	Exhibit 3
PX-405	51:23 – 52:5		Exhibit 3
PX-405	56:14 – 57:12		Exhibit 3
PX-240	58:13 – 58:24		Exhibit 4
DX 528	74:2 – 74:19		Exhibit 7
DX 528	76:14 – 77:13		Exhibit 7
DX 528	78:21 – 80:24		Exhibit 7
DX 528	89:18 – 20		Exhibit 7
DX 528	89:22 – 90:6		Exhibit 7
PX-395	124:15 - 125:3		Exhibit 13
PX-395	128:18 - 128:25		Exhibit 13
PX-395	130:6 - 131:4		Exhibit 13
PX-323	136:5 - 136:24		Exhibit 14
PX-393	145:11 - 146:1		Exhibit 16
PX-393	147:14 - 147:21		Exhibit 16

PX-393	148:19 - 149:12		Exhibit 16
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**TABLE 10**

<b>Exhibits included in the Parties' Designations and/or Counter-Designations for Peter Shen</b>			
<b>Trial Exhibit</b>	<b>Plaintiff's Designations</b>	<b>Defendants' Objections to Testimony</b>	<b>Deposition Exhibit Number</b>
PX-399	25:22-26:1		Exhibit 3
PX-315	70:12-16		Exhibit 7
PX-282	88:18-19		Exhibit 9
PX-321	95:14-24		Exhibit 10
PX-307	112:8-11		Exhibit 12
PX-306	122:22-123:16		Exhibit 13
PX-280	137:11-12		Exhibit 15
<b>Trial Exhibit</b>	<b>Defendants' Designations</b>	<b>Plaintiff's Objections to Testimony</b>	<b>Deposition Exhibit Number</b>
DX 321	95:25 – 96:12	Incomplete; Relevance (402/403)	Exhibit 9
PX-321	105:10 – 106:8		Exhibit 10

**TABLE 11**

<b>Exhibits included in the Parties' Designations and/or Counter-Designations for Patrick Treado</b>			
<b>Trial Exhibit</b>	<b>Defendants' Designations</b>	<b>Plaintiff's Objections to Testimony</b>	<b>Deposition Exhibit Number</b>
DX 3	28:5 - 28:8		Exhibit 2
DX 3	29:12 - 30:9		Exhibit 2
DX 3	61:14 - 62:11	Calls for legal conclusion (403 /611 /701); outside the scope of the 30b6 topics; Relevance (401/402); subject of MIL (outside scope of termination letter)	Exhibit 2
DX 3	62:13 - 63:17	Calls for legal conclusion (403 /611 /701); outside the scope of the 30b6	Exhibit 2

		topics; Relevance (401/402); subject of MIL (outside scope of termination letter)	
DX 3	66:1 - 66:18	Calls for legal conclusion (403 /611 /701); outside the scope of the 30b6 topics	Exhibit 2
DX 3	68:1 - 69:6	Calls for legal conclusion (403 /611 /701); outside the scope of the 30b6 topics	Exhibit 2
DX 3	72:21 - 73:17	Outside the scope of the 30b6 topics	Exhibit 2
DX 3	75:21 - 76:18	Outside the scope of the 30b6 topics; Relevance (401/402); subject of MIL (outside scope of termination letter)	Exhibit 2
DX 3	76:20 - 78:4	Calls for legal conclusion (403 /611 /701); outside the scope of the 30b6 topics; Relevance (401/402); subject of MIL (outside scope of termination letter)	Exhibit 2
DX 223	37:16 - 38:9;		Exhibit 3
DX 223	39:9 - 42:19	Relevance (401/402)	Exhibit 3
DX 300	79:2 - 79:16		Exhibit 4
DX 141	96:6 - 98:12		Exhibit 5
DX 141	101:21 - 105:2	103:13-105:2: Calls for speculation (403/611); lack of personal knowledge (602)	Exhibit 5
DX 141	105:4 - 106:7	105:4-13: Calls for speculation (403/611); lack of personal knowledge (602)	Exhibit 5
DX 141	112:15 - 113:14		Exhibit 5
DX 491A	116:19 - 118:21	Lacks foundation (901/902); hearsay (802)	Exhibit 6
DX 38	124:17 - 125:22		Exhibit 7
DX 38	126:1 - 127:1	126:15-127:1: Relevance (401/402); subject of MIL (outside scope of termination letter)	Exhibit 7
DX 38	127:22 - 128:18	Outside the scope of the 30b6 topics; Relevance (401/402); subject of MIL (outside scope of termination letter)	Exhibit 7
DX 226	129:22 - 131:7		Exhibit 8
DX 89	135:18 - 136:22		Exhibit 9
DX 89	137:12 - 139:7	Relevance (401/402); subject of MIL (outside scope of termination letter)	Exhibit 9
DX 126	150:16 - 151:8;		Exhibit 10

DX 126	152:1 - 152:22	Relevance (401/402); Outside the scope of 30(b)(6) topics	Exhibit 10
DX 42	155:5 - 156:4;	Relevance (401/402); hearsay (802)	Exhibit 11
DX 42	159:1 - 160:6;	Relevance (401/402); hearsay (802)	Exhibit 11
DX 42	161:4 - 163:5	Relevance (401/402); hearsay (802); lack of personal knowledge (602)	Exhibit 11
DX 42	164:20 - 165:15	Relevance (401/402); hearsay (802); lack of personal knowledge (602); outside the scope of the 30b6 topics	Exhibit 11
DX 73	166:22 - 167:12;		Exhibit 12
DX 73	169:16 – 169:21	Relevance (401/402)	Exhibit 12
DX 674	166:22 - 167:12;		Exhibit 13
DX 674	173:22 - 176:9	Hearsay (802)	Exhibit 13
DX 674	180:20 - 182:12	Hearsay (802)	Exhibit 13
DX 147	191:5 - 192:19;	Hearsay (802); lack of personal knowledge (602)	Exhibit 14
DX 147	196:4 - 196:15		Exhibit 14
DX 348	202:19 - 207:1;		Exhibit 15
DX 348	208:2 - 208:10		Exhibit 15
DX 206	210:17 - 213:6;		Exhibit 16
DX 206	227:2 - 228:4		Exhibit 16
DX 7	251:11 – 251:21;		Exhibit 17
DX 7	252:16 – 253:11		Exhibit 17
DX 32	262:3 - 266:1	Relevance (401/402); subject of MIL (outside scope of termination letter)	Exhibit 18
DX 407	266:7 - 266:19;		Exhibit 19
DX 407	267:9 - 268:16	Relevance (401/402); subject of MIL (outside scope of termination letter)	Exhibit 19
DX 407	279:10 – 280:16	Relevance (401/402); subject of MIL (outside scope of termination letter); incomplete (106)	Exhibit 19
DX 407	281:18 – 283:13		Exhibit 19
DX 407	289:21 – 291:18		Exhibit 19
DX 10	304:10 - 305:8		Exhibit 20
DX 74	306:5 - 307:11		Exhibit 21
DX 203	308:7 - 309:19		Exhibit 22
DX 203	310:6 - 311:12		Exhibit 22
DX 203	314:14 - 316:6		Exhibit 22
DX 229	325:15 - 328:15		Exhibit 23
DX 204	336:20 - 337:20	Outside the scope of 30b6 topics	Exhibit 24
DX 94	340:16 - 343:5	Outside the scope of 30b6 topics; relevance (401/402)	Exhibit 25

DX 118	344:2 - 345:4	Outside the scope of 30b6 topics; relevance (401/402)	Exhibit 26
DX 188	349:22 - 350:7	Outside the scope of 30b6 topics; relevance (401/402)	Exhibit 27
DX 184	352:19 - 355:4	Outside the scope of 30b6 topics; relevance (401/402)	Exhibit 28

TABLE 12

<b>Exhibits included in the Parties' Designations and/or Counter-Designations for Alyssa Zrimsek</b>			
<b>Trial Exhibit</b>	<b>Plaintiff's Designations</b>	<b>Defendants' Objections to Testimony</b>	<b>Deposition Exhibit Number</b>
PX-50	71:15-17		Exhibit 7
PX-22	79:15-17		Exhibit 8
PX-52	131:15-19		Exhibit 13
<b>Trial Exhibit</b>	<b>Defendants' Designations</b>	<b>Plaintiff's Objections to Testimony</b>	<b>Deposition Exhibit Number</b>
DX 639	7:8 - 7:16		Exhibit 1
DX 95	38:7 - 40:7		Exhibit 4
DX 52	44:10 - 46:12		Exhibit 5
DX 52	54:15 - 55:12		Exhibit 5
DX 63	62:14 - 65:8		Exhibit 6
DX 41	71:7 - 72:12;		Exhibit 7
DX 41	77:2 – 77:14		Exhibit 7
DX 11	79:15 - 79:17		Exhibit 8
DX 11	80:10 - 81:3		Exhibit 8
DX 11	86:22 - 87:2		Exhibit 8
DX 11	87:3 - 89:1		Exhibit 8
DX 11	149:14 - 150:8		Exhibit 8
DX 68	95:16 - 96:17		Exhibit 9
DX 392	113:5 - 114:2		Exhibit 11
DX 392	114:16 - 115:9		Exhibit 11
DX 392	123:20 - 123:22		Exhibit 11
DX 59	124:1 - 125:18		Exhibit 12
DX 44	131:15 - 133:1		Exhibit 13
DX 66	137:16 - 139:22		Exhibit 14



TABLE 13

Exhibits included in the Parties' Designations and/or Counter-Designations for Adam Saltman	
<b>Plaintiff's Designations</b>	
N/A	
<b>Defendants' Designations</b>	
N/A	

Dated: New York, New York  
March 19, 2025

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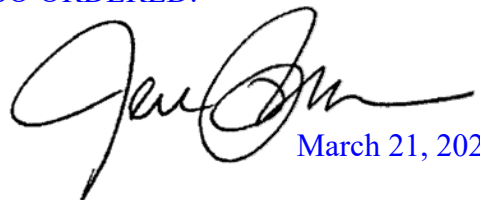
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SO ORDERED.



March 21, 2025